

DAYLE ELIESON
United States Attorney
District of Nevada
TINA NAICKER, CSBN 252766
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 268-5611
Facsimile: (415) 744-0134
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PATRICK CANNON,)	Case No. 2:18-cv-00470-KJD-CWH
Plaintiff,)	
)	
v.)	JOINT STIPULATION FOR EXTENSION OF
)	TIME AND [PROPOSED ORDER]
NANCY A. BERRYHILL,)	
Acting Commissioner of Social Security,)	(SECOND REQUEST)
Defendant.)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from December 8, 2018 to **January 8, 2019**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel respectfully requests additional time due to her heavy caseload and upcoming leave. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-January. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due the same week as the current deadline, which requires multiple levels of review.

1 Counsel is also expected to be on leave during the first week of December. As such, Counsel needs
2 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
3 Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay the
4 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.
6

7
8 Respectfully submitted,

9 Dated: November 26, 2018

/s/ *Cyrus Safa
(*as authorized by email on November 26, 2018)
CYRUS SAFA
Attorney for Plaintiff

12
13 Dated: November 26, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

14
15
16
17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20
21 **ORDER**

22 APPROVED AND SO ORDERED:

23
24 DATED: November 27, 2018


HON. CARL J. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

CM/ECF:

Attorneys for Plaintiff

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney